



GSD-10 INSIGNIFICANT ACTIVITIES – INSTRUCTIONS

The purpose of GSD-10 is to identify all trivial and insignificant activities in operation at the source. This form is required for all air permit applications submitted to the [Indiana Department of Environmental Management \(IDEM\), Office of Air Quality \(OAQ\)](#). For the purposes of this form, the term “source” refers to the plant as a whole and NOT to the individual emissions units.

Indiana's Part 70 permit program regulations require that an applicant list insignificant activities in the application. Insignificant activities are defined in 326 IAC 2-7-1(20).

The definition includes the exemption levels specified in 326 IAC 2-1-1 and the following:
< 0.6 ton/year or < 3.29 lb/day -- Lead (Pb)
< 25 lb/day -- Carbon Monoxide (CO)
The exemption levels under 326 IAC 2-1-1 are as follows:
< 5 lb/hour or < 25 lb/day -- Particulate Matter (PM)
< 10 lb/hour or < 50 lb/day -- Sulfur dioxide (SO ₂)
< 5 lb/hour or < 25 lb/day -- Nitrogen oxides (NO _x)
< 3 lb/hour or < 15 lb/day -- Volatile organic compounds (VOC)

If you have any questions, contact the IDEM OAQ Permit Reviewer of the Day (PROD) at (317) 233-0178 or 1-800-451-6027 extension 3-0178 (toll free call within Indiana) or via electronic mail using the [online form](#) or a direct email to OAMPROD@dem.state.in.us.

SUBMISSION OF CONFIDENTIAL RECORDS

All information submitted to IDEM will be made available to the public unless it is submitted under a claim of confidentiality. Claim of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in [326 IAC 17.1-4-1](#). Failure to follow these requirements exactly, will result in your confidential information becoming a public record, available for public inspection. To ensure that your information remains confidential, refer to the [IDEM, OAQ information regarding submittal of confidential business information](#). For more information on confidentiality for certain types of business information, please review IDEM's [Nonrule Policy Document Air-031-NPD regarding Emission Data](#).

Part A: Trivial Activities

Part A is intended to identify all trivial activities in operation at the source. **Items 1 through 17** are defined as trivial activities in [paragraph 40 of Section 1 of Rule 7 from Article 2 of Title 326 of the Indiana Administrative Code \(326 IAC 2-7-1\(40\)\)](#). Detailed information concerning the emissions of these activities is not required; however, detailed emissions information must be provided upon request by the department. Indicate which activities are present by checking the appropriate box.

Part B: Insignificant Activities

Part B is intended to identify all insignificant activities in operation at the source. **Items 18 through 68** are defined as insignificant activities in [326 IAC 2-7-1\(21\)](#). Detailed information concerning the emissions of these activities is not required; however, detailed emissions information must be provided upon request by the department. Indicate which activities are present by checking the appropriate box.

Part C: Other Activities

Part C is intended to identify all other trivial and insignificant activities in operation at the source that are not identified above in Parts A or B. For **item 69**, identify any “other activities” in operation at the source, and provide a brief description.

Part D: Activities with HAP Emissions

Part D is intended to identify all trivial and insignificant activities in operation at the source that have the potential to emit hazardous air pollutants (HAP). These activities may or may not be identified above in Parts A or B. Indicate which type of "other activities" are present by checking the appropriate box (**items 70 & 71**), and provide a brief description. For a complete list of HAPs, please refer to the [United States Environmental Protection Agency's \(US EPA\) Air Toxics Website \(ATW\) original list of HAPs](#) and [list of modifications to the HAPs](#).

The source shall provide a description of the insignificant activity, including identification of the HAPs emitted and any applicable requirements. A source may rely on MSDS sheets, product labels, other manufacturer's information, or other technical and scientific judgement for identification of HAPs. Insignificant activities that are part of a multi-step process line shall be reported as such and the source shall include a description of the function and components of the process line.

Insignificant activities that perform equivalent functions shall be grouped and the function and number of the units shall be included in the application.

An applicant may wish to provide the information above on a separate sheet(s) and label GSD-10(a), Insignificant Activities, if additional space is needed.

Part E: Specifically Regulated Insignificant Activities

Part E is intended to identify all specifically regulated insignificant activities. Examples of specifically regulated activities that may have insignificant emissions include boilers, process heaters, any activity regulated under a federal rule such as MACT or BACT, etc. If you are not sure if an emissions unit would be considered a specifically regulated insignificant activity, contact the PROD for additional guidance.

72. Unit ID:

Provide the identification number for each emissions unit that qualifies as a specifically regulated insignificant activity. The identification numbers listed on this form should correspond to the emissions unit identified on the Plant Layout and Process Flow diagrams.

73. Description:

Provide a brief description of each specifically regulated insignificant activity. The size or capacity of the activity should be included whenever possible.

74. Pollutant:

For each specifically regulated insignificant activity identified, list each criteria pollutant or hazardous air pollutant emitted to the atmosphere during normal operation. If there are multiple pollutants for an activity, use a new row for each pollutant.

75. Actual Emissions:

For each emissions unit specific pollutant identified, provide the actual emissions level based on normal operating conditions (i.e., actual hours of operation, using control equipment, etc.) in standard units and also in tons per year (tpy). Since the units will vary depending on the process, appropriate units must be included or the application process may be stopped. The standard units used for this form should correspond to the units used on form CD-01, Facility/Unit Compliance Status. The annual emissions level should be calculated using data from the previous year of operation and should correspond to the emissions reported on the Annual Emission Statement (if required). It is important to provide an estimate of actual emissions so we can compare this number to the potential to emit.

76. Potential Emissions:

For each emissions unit specific pollutant identified, provide the total potential to emit in standard units and also in tons per year (tpy) based on the maximum design capacity of the emissions unit and operating at 8760 hours/year. Since the units will vary depending on the process, appropriate units must be included or the application process may be stopped. The standard units used for this form should correspond to the units used on form CD-01, Facility/Unit Compliance Status.

NOTE: Indiana Law requires permit emission limits to be based on the [potential to emit \(PTE\)](#) air pollutants as if the process was operating at full capacity 24 hours per day, seven (7) days per week and 365 days per year (i.e., 8760 hours per year).

Some sources may opt to take a limit on the potential to emit for the entire source, or individual processes, in order to better reflect the actual operating scenario. Limitations on operations (work practices) or emissions (control equipment) may be included in the calculations only to the extent that the limitations are federally enforceable (required by NSPS, NESHAP, approved SIP requirement, NSR/PSD permit condition, etc.). Limitations that are not federally enforceable cannot be included (state only requirement, local agency permit condition, etc.).

77. Citation:

Provide the citation for each federal or state rule that applies to the specifically regulated insignificant activity.

NOTE: Part 70 and FESOP applicants are not required to provide any emissions information unless an exemption from requirements is being proposed. If you are proposing an exemption, then you must include all requested information. The exclusion of emission information for insignificant activities only applies to the application content requirements and not the determination or imposition of any applicable requirement or the calculation of fees.

Summary of Websites

1. Indiana Department of Environmental Management (IDEM): <http://www.in.gov/idem>
2. Office of Air Quality (OAQ): <http://www.in.gov/idem/air>
3. Permit Reviewer of the Day (PROD) online form: <http://www.in.gov/idem/air/permits/prodform.html>
4. Article 17.1, Rule 4, Section 1 of the Indiana Administrative Code (326 IAC 17.1-4-1):
<http://www.in.gov/legislative/iac/T03260/A00171.PDF>
5. IDEM, OAQ guidance regarding submittal of confidential business information:
<http://www.in.gov/idem/air/permits/apps/cbi.pdf>
6. IDEM's Nonrule Policy Document regarding Emission Data (Air-031-NPD):
<http://www.in.gov/idem/air/rules/nrpd/index.html>
7. Title 326 of the Indiana Administrative Code, Article 2, Rule 7, Section 1 (326 IAC 2-7-1):
<http://www.in.gov/legislative/iac/t03260/a00020.pdf>
8. United States Environmental Protection Agency (US EPA): <http://www.epa.gov>
9. US EPA Air Toxics Website (ATW): <http://www.epa.gov/ttn/atw>
10. US EPA Air Toxics Website (ATW) Original List of HAPs: <http://www.epa.gov/ttn/atw/orig189.html>
11. US EPA Air Toxics Website (ATW) List of Modifications to the HAPs List:
<http://www.epa.gov/ttn/atw/pollutants/atwsmod.html>
12. Explanation of Potential To Emit: <http://www.in.gov/idem/guides/permit/air/airemissions.html#pte>